

CITY OF BALTIMORE

BRANDON M. SCOTT,  
Mayor



DEPARTMENT OF LAW  
JAMES L. SHEA, CITY SOLICITOR  
100 N. HOLLIDAY STREET  
SUITE 101, CITY HALL  
BALTIMORE, MD 21202

January 13, 2021

**VIA ECF/CM**

The Honorable Catherine C. Blake  
101 West Lombard Street  
Chambers 7D  
Baltimore, MD 21201

Re: *Kerron Andrews v. Baltimore Police Department, et al.*,  
Civil Action No. 16-cv-02010-CCB,  
Baltimore Police Department Status Report

Dear Judge Blake:

Please accept this letter in response to Your Honor's December 10, 2020 and January 8, 2021 Orders (hereinafter "the Orders"). *See* ECF Nos. 98 & 104.

Pursuant to the Orders, the Baltimore Police Department ("BPD") has renewed its search as instructed. Undersigned counsel has made requests to the following units/departments: Fiscal, Special Activities Unit/Advanced Technical Team ("ATT"), the Criminal Investigations Division/Shooting Unit, Written Directives, and Training.

Written Directives is the unit that maintains BPD's policies. ATT is a subsection of the Special Activities Unit that assists and supports other units with criminal investigations by utilizing technology, such as cell site simulators and pen registers.

Using the phraseology "any and all purchase orders or product information sheets" from L3Harris's Responses and Objections to [Plaintiff's] Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises, which BPD received on December 8, 2020, Fiscal and ATT also conducted additional searches for the time period of prior to May 31, 2014. BPD proffers that some documents located may be responsive to Request Nos. 10, 12, 16, and 27, but are or may be export controlled or otherwise protected by federal law.

BPD was able to obtain guidance from counsel for L3Harris regarding how to locate the device's serial number, if any. As a supplemental response to its prior response to Request No. 3, BPD located the serial number and provided it to the Individual Defendants and Plaintiff on January 13, 2021 informally and pursuant to the resolution of the pending protective order dispute. Prior to Plaintiff's issuance of his Requests for Production of Documents, the device's "part number" and "FCC ID" were provided

CITY OF BALTIMORE

BRANDON M. SCOTT,  
Mayor



DEPARTMENT OF LAW  
JAMES L. SHEA, CITY SOLICITOR  
100 N. HOLLIDAY STREET  
SUITE 101, CITY HALL  
BALTIMORE, MD 21202

---

to all parties on August 27, 2020 informally and pursuant to the resolution of the pending protective order dispute in order to aid Plaintiff in his discovery requests to the manufacturer.

Undersigned counsel queried both the Office of Legal Affairs and General Litigation units of the Baltimore City Law Department regarding Request No. 29. Neither unit is aware of documents existing concerning the kind of testimony referenced in this request.

After numerous thorough and diligent searches, BPD has not located any additional documents other than what its searches from August through early December 2020 have yielded, or as otherwise described above.

BPD hereby incorporates, maintains, and reiterates its objections and responses in its various discovery responses, as well as any oral objections made during conference calls with counsel and/or the Court. BPD also specifically incorporates, maintains, and reiterates its prior objections to Plaintiff's discovery requests that exceed the Fourth Circuit's Remand Order. *See* ECF No. 60.

Respectfully submitted,

James L. Shea  
BALTIMORE CITY SOLICITOR

/s/

---

Natalie R. Amato  
Assistant City Solicitor  
Federal Bar No. 20749

Baltimore City Department of Law  
Office of Legal Affairs  
City Hall, Room 101  
100 N. Holliday Street  
Baltimore, MD 21202  
410.371.9298 (telephone)  
410.396.2126 (facsimile)  
[natalie.amato@baltimorecity.gov](mailto:natalie.amato@baltimorecity.gov)  
*Attorney for BPD & Kevin Davis*